

CHAITMAN LLP

465 Park Avenue
New York, New York 10022
Phone & Fax: (888) 759-1114
Helen Davis Chaitman
Gregory M. Dexter
hchaitman@chaitmanllp.com
gdexter@chaitmanllp.com

*Attorneys for Defendants Carol Nelson,
Stanley Nelson, and Helen Saren-Lawrence*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

CAROL NELSON, individually and as joint tenant;
and STANLEY NELSON, individually and as joint
tenant,

Defendants.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-04377 (SMB)

Adv. Pro. No. 10-04658 (SMB)

v.

CAROL NELSON,

Defendant.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

HELENE SAREN-LAWRENCE,

Defendant.

Adv. Pro. No. 10-04898 (SMB)

DECLARATION OF HELEN DAVIS CHAITMAN

I, Helen Davis Chaitman, hereby declare, under penalty of perjury pursuant to 28 U.S.C. §1746, as follows:

1. I am partner with Chaitman LLP, counsel to numerous clawback defendants (“Defendants”). I am a member of the bars of New York and New Jersey, and of this Court.

2. I submit this declaration in further support of Defendants’, Helen Saren-Lawrence, Carol Nelson and Stanley Nelson, motion to adjourn the trial dates, *sine die*, pursuant to Rule 16(b)(4) of the Federal Rules of Civil Procedure.

3. Attached hereto as **Exhibit 1** is a true and accurate copy of excerpts of the Transcript of Proceedings held before Hon. Judge Stuart M. Bernstein dated June 29, 2017.

4. Attached hereto as **Exhibit 2** is a true and accurate copy of excerpts of the Transcript of Proceedings held before Hon. Judge Stuart M. Bernstein dated May 17, 2016.

5. Attached hereto as **Exhibit 3** is a true and accurate copy of this Court’s January 7, 2017 Order, ECF No. 14807.

6. Attached hereto as **Exhibit 4** is a true and accurate copy of excerpts of the Transcript of Proceedings held before Hon. Judge Stuart M. Bernstein dated December 13, 2016.

7. Attached hereto as **Exhibit 5** is a true and accurate copy of excerpts of the Transcript of Proceedings held before Hon. Judge Stuart M. Bernstein dated January 5, 2017.

8. Attached hereto as **Exhibit 6** is a true and accurate copy of the Transcript of Proceedings held before Hon. Judge Stuart M. Bernstein dated July 26, 2017.

9. Attached hereto as **Exhibit 7** is a true and accurate copy of Discovery Arbitrator's Order No. 3, dated April 20, 2017 and filed in *Picard v. Trust U/Art Fourth O/W/O Israel Wilenetz, et al.*, Adv. Pro. No. 10-04995 (SMB).

10. Attached hereto as **Exhibit 8** is a true and accurate copy of the Transcript of Proceedings held before Hon. Judge Stuart M. Bernstein dated September 28, 2016.

11. Attached hereto as **Exhibit 9** is a true and accurate copy of a letter from Edward J. Jacobs of Baker Hostettler dated May 25, 2017, *In re Bernard L. Madoff*, Adv. Pro. No. 08-01789, ECF No. 16079.

12. Attached hereto as **Exhibit 10** is a true and accurate copy of excerpts of the Transcript of Proceedings held before Hon. Judge Stuart M. Bernstein dated May 31, 2017.

13. Attached hereto as **Exhibit 11** is a true and accurate copy of this Court's Order Implementing the Court's May 31, 2017 and June 29, 2017 Bench Rulings on Multiple Discovery Disputes, filed in *In re Bernard L. Madoff*, Adv. Pro. No. 08-01789 (SMB), and specifically captioned *Picard v. Defendants Represented by Chaitman LLP*, ECF. No. 16459.

Dated: New York, New York
December 14, 2018

CHAITMAN LLP

By: /s/ Helen Davis Chaitman
Helen Davis Chaitman
Gregory M. Dexter
hchaitman@chaitmanllp.com
gdexter@chaitmanllp.com
465 Park Avenue
New York, New York 10022
Phone & Fax: 888-759-1114

*Attorneys for Defendants Carol Nelson,
Stanley Nelson, and Helen Saren-Lawrence*